

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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) **Civil Action No. 03. MDL 1570 (GBD)**
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**DEFENDANT INTERNATIONAL ISLAMIC RELIEF ORGANIZATION'S 26(a)(1)
AMENDED INITIAL DISCLOSURES**

Defendant International Islamic Relief Organization ("IIRO"), by and through its undersigned counsel, makes the following Amended Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). These Amended Initial Disclosures are based on information reasonably available to IIRO as of the date hereof. The disclosures herein are provided without prejudice to the rights of IIRO to identify additional witnesses or evidence. Further, IIRO reserves the right to supplement these disclosures.

I. Individuals With Relevant Discoverable Information

The following individuals are likely to have discoverable information that IIRO may use to support its defenses. IIRO does not consent to or authorize any communications with its employees, agents, officers, or directors, whether formerly or presently associated or employed by IIRO and does not consent to or authorize any other communication prohibited by any applicable rule of professional conduct.

1. Dr. Adnan Khalil Basha

Former Secretary General – IIRO

Address: Makkah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Among other things, Dr. Basha may have information regarding IIRO policies, procedures and operations; IIRO's relationship to or affiliation with other entities; and IIRO's defenses.

2. Mr. Ammar Shawwat

Oracle Financial Consultant – IIRO Head Office, Jeddah

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: IIRO custodian of documents

3. Mr. Muhammad Hillis

Coordinator – IIRO Head Office, Jeddah

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Hillis may have information about IIRO's branch office operations and its defenses.

4. Mr. Omar Bashir Khalid

Deputy Internal Auditor – IIRO Head Office, Jeddah

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Khalid may have information relating to IIRO's internal audits.

5. Mr. Saeed Al-Sarahaan

Financial Controller – IIRO Head Office, Jeddah

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Sarahaan may have information relating to IIRO's financial controls.

6. Mr. Saleh Al-Dhibani

Urgent Relief Supervisor – IIRO Head Office, Jeddah

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Dhibani may have information relating to IIRO Albania and Kosovo operations and IIRO Eastern Province Regional Office operations.

7. Dr. Abdul Hamid Al-Mujil

Former Executive Director – IIRO Eastern Province Regional Office

Address: University of Dammam, College of Architecture and Planning, Engineering Department, Dammam, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Dr. Al-Mujil may have information relating to IIRO Eastern Province Regional Office operations.

8. Mr. Mahmud Said

External Auditor – M. Said & Co Chartered Certified Accountants

Address: 137 Blackstock Rd, London N4 2JW, United Kingdom

Contact: cCn be reached through counsel

Subject Matter: Mr. Said may have information relating to IIRO Indonesia operations.

9. Mr. Fahad bin Mohammad Sanad Al-Harbi

Former Director – IIRO Branch Office, Indonesia

Address: IIRO Branch Office, Jakarta, Indonesia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Harbi may have information relating to IIRO Indonesia operations.

10. Mr. Faiz Wardy

Secretary – IIRO Branch Office, Indonesia

Address: IIRO Branch Office, Jakarta, Indonesia

Contact: Ccan be reached through counsel

Subject Matter: Mr. Wardy may have information relating to IIRO Indonesia operations.

11. Mr. Abdelhadi Daguit

Former Director – IIRO Branch Office, Philippines

Address: Manila, Philippines

Contact: Can be reached through counsel

Subject Matter: Mr. Daguit may have information relating to IIRO Philippines operations.

12. Mr. Rahmatullah Nazir Khan Gari

Former Director – IIRO Pakistan and Bangladesh

Address: Sarajevo, Bosnia and Herzegovina

Contact: Can be reached through counsel

Subject Matter: Mr. Gari may have information relating to IIRO Pakistan and IIRO Bangladesh operations.

13. Mr. Abdu Atain

Director – IIRO Branch Office, Pakistan

Address: IIRO Branch Office, Islamabad, Pakistan

Contact: Can be reached through counsel

Subject Matter: Mr. Atain may have information relating to IIRO Pakistan operations.

14. Mr. Muhammad Javid Butt

Accountant – MWL Branch Office, Pakistan

Address: IIRO Branch Office, Islamabad, Pakistan

Contact: Can be reached through counsel

Subject Matter: Mr. Butt may have information relating to IIRO Pakistan financials.

15. Mr. Moayid Al-Butayri

Former Director – IIRO Branch Office, Pakistan

Address: Al Khobar, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Butayri may have information relating to IIRO Pakistan operations.

16. Mr. Qari Nooruzaman Shurafat

Quran Program Supervisor – IIRO Branch Office, Afghanistan

Address: IIRO Branch Office, Kabul, Afghanistan

Contact: Can be reached through counsel

Subject Matter: Mr. Shurafat may have information relating to IIRO Peshawar, Pakistan and Afghanistan operations.

17. Mr. Abdulrauf Khalaf Al-Sharman

Director – IIRO Branch Office, Bosnia & Herzegovina

Address: IIRO Branch Office, Sarajevo, Bosnia & Herzegovina

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Sharman may have information relating to IIRO Bosnia operations.

18. Mr. Mustafa Hussain Omar

Accountant – IIRO Branch Office, Bosnia & Herzegovina

Address: IIRO Branch Office, Sarajevo, Bosnia & Herzegovina

Contact: Can be reached through counsel

Subject Matter: Mr. Omar may have information relating to IIRO Bosnia operations and financials.

19. Mr. Ismat Al-Bahiti

Director – IIRO Balkans Region Offices

Address: IIRO Branch Office, Pristine, Kosovo

Contact: Can be reached through counsel

Subject Matter: Mr. Bahiti may have information relating to IIRO Balkans operations.

20. Mr. Ibrahim Fadlallah

Administrator – IIRO Branch Office, Kosovo

Address: IIRO Branch Office, Pristine, Kosovo

Contact: Can be reached through counsel

Subject Matter: Mr. Fadlallah may have information relating to IIRO Kosovo operations.

21. Mr. Saad Al-Obaidi

Former Director – IIRO Branch Office, Kosovo

Address: Bosnia & Herzegovina

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Obaidi may have information relating to IIRO Kosovo operations.

22. Mr. Edmond Saliu

Program Coordinator – IIRO Branch Office, Albania

Address: IIRO Branch Office, Tirana, Albania

Contact: Can be reached through counsel

Subject Matter: Mr. Saliu may have information relating to IIRO Albania operations.

23. Mr. Mohamed Zeqiri

Program Coordinator – IIRO Branch Office, Macedonia

Address: IIRO Branch Office, Tetovo, Macedonia

Contact: Can be reached through counsel

Subject Matter: Mr. Zeqiri may have information relating to IIRO Macedonia operations

24. Any witness on Plaintiffs' or Defendants' witness lists.

II. Categories of Relevant Documents

IIRO has already produced copies of documents, in its possession, custody, or control that it may use to support its defenses. *See* IIRO 000001 – IIRO 286988. However, copies of

documents concerning the employment of certain individuals formerly or presently employed by and/or affiliated with IIRO are being collected for production to Plaintiffs.

IIRO's disclosures are made subject to and without waiving the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay, or any other proper ground to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action.

III. Computation of Damages

IIRO has not asserted a claim for damages against any other party in this action.

IV. Insurance

IIRO is unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a judgment that may be entered in this action, or to indemnify or reimburse payments made to satisfy such a judgment.

Respectfully submitted,

/s/ Eric L. Lewis

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